

Environmental Protection Agency

117 W. Main Street Collinsville, IL. 62234

618/345-4606

July 23, 1984

CERTIFIED MAIL

#128775

Refer to: LPC 16304538 - St. Clair County - East St. Louis/Wastex Research #2, Inc.
ILD 980700744
Compliance Inquiry Letter

Wastex Research, Inc.
2000 Broadway
East St. Louis, Illinois 62205
Attention: James Markle

US EPA RECORDS CENTER REGION 5



417673

Dear Mr. Markle:

Your hazardous waste management facility located in East St. Louis, Illinois was inspected on July 12, 1984, by Margo Bilyay and Perry Mann, representing this Agency, in order to determine compliance with respect to Title 35: Illinois Administrative Code, Subtitle C, Subpart F: Ground Water Monitoring. The inspection disclosed the following apparent violations of rules and regulations:

Class I

- 725.190 (all parts therein) - Failure to implement a ground water monitoring program capable of determining the facility's impact on the quality of ground water in the uppermost aquifer underlying the facility.
- 725.191 (all parts therein) - Failure to implement a ground water monitoring system.
- 725.192 (all parts therein) - Failure to implement a sampling analysis plan with respect to the ground water monitoring system.
- 725.193 (all parts therein) - Failure to prepare an outline of a ground water quality assessment program.
- 725.194 (all parts therein) - Failure to implement a record keeping and reporting plan with respect to the ground water monitoring program.

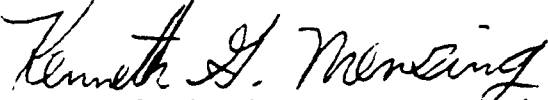
Please submit in writing, within ten (10) calendar days of this letter date, the reasons for the apparent violations outlined above, as well as a description of the steps you have instituted to prevent any further recurrence of the apparent violations cited from the subject inspection. The written response should be sent to the address of this office, given above.

July 23, 1984

Further, take notice that non-compliance with the Illinois Environmental Protection Act or Rules and Regulations adopted thereunder may result in enforcement action pursuant to Title VIII of the Illinois Environmental Protection Act, Ch. 111 1/2, Ill. Rev. Stat., Sec. 1001 et. seq.

Sincerely,

ENVIRONMENTAL PROTECTION AGENCY



Kenneth G. Mensing, Southern Regional Manager
Field Operations Section
Division of Land Pollution Control

Enclosures: Subpart F Inspection Report
Subtitle G Regulations

HRD/cas

cc: Division File
cc: Southern Region
cc: Mark Haney
cc: Phil Van Ness
cc: Bob Kuykendall

APPENDIX A-1

FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM STATUS STANDARDS COVERING GROUNDWATER MONITORING

General Information

USEPA Number: ILD 980700744 IEPA Number: 1630450038
 Major Facility: YES/NO Notified As: G/T/TSD Regulated As: G/T/TSD
 Facility Name: EAST ST. LOUIS / WASTEX RESEARCH
 Street: 2000 BROADWAY
 City: EAST ST. LOUIS State: ILLINOIS Zip Code: 62205
 Phone: (618) 271-2372 County: ST. CLAIR
 Facility Contact Official: Joe Burroughs Branch/Organization: WASTEX RESEARCH
 Title: Chief Engineer
 Region: S Date of Inspection: 09/17/85 Time: (From) 10:00 (To) 11:30 am
 Type of Inspection: GWM RR F/U / /
 (Date of Initial Inspection)

Preparer Information:

Name: Charles Reiter
 Agency/Title: EPS III
IEPA / GWM Coordinator
 Telephone: (618) 345-4606

Section	Class I	Class II
725.190, 725.191,	2	
725.192, 725.193,	2	
725.194	1	

TOTAL Class I's & II's

5

Type of facility: (check appropriately)

- a) surface impoundment
- b) landfill
- c) land treatment facility
- d) disposal waste pile*

YES NO UNKNOWN WAVED

X
 X
 X
 X

Groundwater Monitoring Program

1. Was the groundwater monitoring program reviewed prior to site visit? if "NO",

- a) Was the groundwater program reviewed at the facility prior to site inspection?

* In litigation

X

X

2. Has a groundwater monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility) been implemented? 725.190(a)

X

No groundwater program available

*Listed separate from landfill for convenience of identification.



DATE: July 23, 1984
TO: Division File
FROM: Margo R. Dilday - Southern Region MRD
SUBJECT: LPC 16304538 - St. Clair County - East St. Louis/Wastex #2
ILD 980700744 - Subpart F Inspection conducted July 12, 1984

This memorandum serves to highlight and clarify items within the checklist to better indicate alleged violations and point out deficiencies, which by a strict interpretation of 725.190-194, the latter cannot be considered violations, but nevertheless cause the ground water monitoring program to be inadequate relative to the information described to be desirable in the guidelines, Groundwater Monitoring Guidance of Owners and Operators of Interim Status Facilities, USEPA; SW-963: Revised March 1983.

Perry Mann and this writer visited the subject facility on July 12, 1984 to determine compliance with the Subpart F Ground Water Monitoring requirements. Joe Burroughs and Alvin Markle accompanied us during the on-site inspection.

Appendix A-1

No ground water monitoring program has been proposed or implemented at Wastex #2. No monitoring wells existed and no geohydrologic investigation was under way.

Appendix A-2

Not applicable as of the 7/12/84 inspection date.

Appendix A-3

Not applicable as of the 7/12/84 inspection date.

Appendix B

See Appendix A-1 above.

Appendix C

Not applicable as of the 7/12/84 inspection date.

Appendix D

Not applicable as of the 7/12/84 inspection date.

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EPA - D.L.P.C.
STATE OF ILLINOIS

July 23, 1984

The concrete basin located beneath the product storage tanks still contains D001 waste (as classified by Wastex). No Subpart F ground water monitoring program has been proposed or implemented. The area continues to be "used for the retention of any leaks or spills of hazardous waste" as stated in the August 26, 1983 letter from James Markle to Ken Mensing.

The integrity of the basin has not been checked since Wastex #2 started operating, although wastes have been accumulating there since before Wastex #2 took over, per Mr. Burroughs. It is not known if the basin leaks because no inspections of the sides or the bottom have been conducted.

It should be noted that Mr. Markle was notified in an August 10, 1983 CIL and again in an October 4, 1983 CIL that his "area located beneath the product storage tanks" meets the definition of a surface impoundment and is regulated under Subpart F: Ground Water Monitoring and Subpart K: Surface Impoundments.

Alvin Markle informed us that a contractor had been hired to remove material from the impoundment so that it could be cleaned out. Perry Mann informed him that he should close it out following Subpart K closure requirements.

MRD/cas

cc: Mark Haney ✓
cc: Southern Region
cc: Bob Kuykendall
cc: Phil Van Ness

APPENDIX A-1

FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM
STATUS STANDARDS COVERING GROUND-WATER MONITORING

Company Name: Wastex Research #2, Inc.; IEPA I.D. Number: LPC 16304538
 Company Address: 2000 Broadway Ave.; USEPA I.D. Number: ILD980700744
East St. Louis; Inspector's Name: Margo Dilday
IL 62205; Perry Mann
 Company Contact/Official: James Mackle; Branch/Organization: _____
 Title: President; Date of Inspection: July 12, 1984

Type of facility: (check appropriately)

- a) surface impoundment
- b) landfill
- c) land treatment facility
- d) disposal waste pile*

Yes No Unknown Wavied

<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>

Ground-Water Monitoring Program

1. Was the ground-water monitoring program reviewed prior to site visit?
If "No,"

☐ ☒

a) Was the ground-water program reviewed at the facility prior to site inspection?

☒ ☐ no documented program

2. Has a ground-water monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility) been implemented? 725.190(a)

☐ ☒ ☐ ☐

*Listed separate from landfill for convenience of identification.

Completed checklist consists of Appendix A-1.

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STATE OF ILLINOIS

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Wavied</u>
3. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area? 725.191(a)(1)	—	✓	—	—
a) Are ground-water samples from the uppermost aquifer, representative of background ground-water quality and not affected by the facility (as ensured by proper well number, locations and depths?)	—	N/A	—	—
4. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste handling or management area? 725.191(a)(2)	—	✓	—	—
a) Do well numbers, locations and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer?	—	N/A	—	—
5. Have the locations of the waste management areas been verified to conform with information in the ground-water program?	—	N/A	—	no ground-water program
a) If the facility contains multiple waste management components, is each component adequately monitored?	—	✓	—	—
6. Do the numbers, locations, and depths of the ground-water monitoring wells agree with the data in the ground-water monitoring system program? If "No," explain discrepancies.	—	N/A	—	—
7. Well completion details. 725.191(c)				
a) Are wells properly cased?	—	N/A	—	—
b) Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?	—	N/A	—	—
c) Are annular spaces properly sealed to prevent contamination of ground-water?	—	N/A	—	—

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Wavied</u>
8. Has a ground-water sampling and analysis plan been developed? 725.192(a)		<input checked="" type="checkbox"/>		
a) Has it been followed?		<u>N/A</u>		
b) Is the plan kept at the facility?		<u>N/A</u>		
c) Does the plan include procedures and techniques for:				
1) Sample collection?		<u>N/A</u>		
2) Sample preservation?		<u>N/A</u>		
3) Sample shipment?		<u>N/A</u>		
4) Analytical procedures?		<u>N/A</u>		
5) Chain of custody control?		<u>N/A</u>		
9. Are the required parameters in ground-water samples being tested quarterly for the first year? 725.192(b) and 725.192(c)(1)		<input checked="" type="checkbox"/>		no samples taken by facility
a) Are the ground-water samples analyzed for the following:				
1) Parameters characterizing the suitability of the ground-water as a drinking water supply? 725.192(b)(1)		<u>N/A</u>		
2) Parameters establishing ground-water quality? 725.192(b)(2)		<u>N/A</u>		
3) Parameters used as indicators of ground-water contamination? 725.192(b)(3)		<u>N/A</u>		
(i) For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 725.192(c)(2)		<u>N/A</u>		
(ii) Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 725.192(c)(2)		<u>N/A</u>		

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Waived</u>
b) For facilities which have completed first year ground-water sampling and analysis requirements:	N/A ; first year of sampling not completed as required			
1) Have samples been obtained and analyzed for the ground-water quality parameters at least annually? 725.192(d)(1)	—	—		
2) Have samples been obtained and analyzed for the indicators of ground-water contamination at least semi-annually? 725.192(d)(2)	—	—		
c) Were ground-water surface elevations determined at each monitoring well each time a sample was taken? 725.192(e)	—	—		
d) If it was determined that modification of the number, location or depth of monitoring wells was necessary, was the system brought into compliance with 725.191(a)? 725.193	—	—		
10. Has an outline of a ground-water quality assessment program been prepared? 725.193(a)	—	✓		
a) Does it describe a program capable of determining:				
1) Whether hazardous waste or hazardous waste constituents have entered the ground-water?	N/A			
2) The rate and extent of migration of hazardous waste or hazardous waste constituents in ground-water?	N/A			
3) Concentrations of hazardous waste or hazardous waste constituents in ground-water?	N/A			
b) Were records kept of the analyses and evaluations, specified in the ground-water quality assessment (throughout the active life of the facility)? 725.194(b)(1)	N/A			
1) If a disposal facility, were(are) records kept through the post-closure period as well?	N/A			

Yes No Unknown Wavied

11. Have records been kept of analyses for parameters in 725.192(c) and (d)?
725.194(a)(1)

— ☒ no analyses

12. Have records been kept of ground-water surface elevations taken at the time of sampling for each well? 725.194(a)(1)

N/A no wells, no samples

13. Have records been kept of required
evaluations ~~elevations~~ in 725.192(e)? 725.194(a)(1)

— ☒ no evaluations

*EPA will be proposing (Spring 1982) to replace this reporting requirement with an exception reporting system where reports will be submitted only where maximum contaminant levels or significant changes in the contamination indicators or other parameters are observed. EPA has delayed compliance stage for 14 a) above until August 1, 1982 (Federal Register, February 23, 1982, p. 7841-7842) to be coupled with exception reporting in the interim.